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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Petitions for Protection from Whipsawing)	IB Docket No. 03-38
on the U.S.-Philippines Route)	

WorldCom, Inc. (“WorldCom”) hereby submits this Opposition to the Motions for Extension of Time in the above-referenced proceeding submitted by counsel for the Philippine Long Distance Telephone Company (“PLDT”), Verizon, and Globe Telecom (“Globe”), respectively on February 9, 2003. In its Motion, PLDT requests that the Commission grant an extension of time for filing its response to the Petitions of WorldCom and AT&T in the above-referenced proceeding by five days, from February 20, 2003, to February 25, 2003. Verizon and Globe similarly request that the Commission extend the filing period by four days, from February 20, 2003 to February 4, 2003. WorldCom submits that it would be contrary to the public interest to permit the Philippines carriers to further delay Commission action that could put an end to the service disruptions on the U.S.-Philippines route.

As WorldCom noted in its Petition, PLDT has blocked all traffic from WorldCom terminating on PLDT's network in the Philippines since February 1, 2003. PLDT has continued to block WorldCom's traffic for nearly three weeks. In addition, since that time Globe has significantly degraded the flow of WorldCom's traffic to Globe's network, and PLDT's mobile

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subsidiary, Smart, has blocked all traffic from WorldCom. In its Petition, WorldCom requests that the Commission address such “whipsawing” by issuing a non-payment order.

Given these urgent circumstances, the Motions for Extension of Time are not justified. Indeed, section 1.46(a) of the Commission’s rules, 47 C.F.R. § 1.46(a), states that “[i]t is the policy of the Commission that extensions of time shall not be routinely granted.” The standard for granting an extension of time, therefore, is high, and that standard is not met here. Counsel for PLDT, Globe and Verizon argue that they require four or five extra days to prepare their filings due to the snowstorm in the Washington area on February 16th and 17th. They claim that the snow prevented them for accessing their offices. The Commission’s Public Notice announcing the Petitions, however, was released on February 10, 2003, and PLDT acknowledges that it knew about the Petitions on that date. Counsel for PLDT, Globe and Verizon, therefore, had an entire week *before* the snowstorm to work on their responses to the Petition. WorldCom submits that there is simply no justification for a four or five day extension given the time available prior to the snowstorm and the fact that the federal government and counsel’s offices were closed for one working day.

The Motions by PLDT and Globe are especially troubling given that those two carriers are blocking the traffic of WorldCom and AT&T. Globe and Verizon go so far as to claim in their Motions that “the extension will not significantly prejudice the interests of AT&T or WorldCom.” Globe Motion, at 2; Verizon Motion at 2. To the contrary, every day that such blocking continues, **U.S.** carriers and their consumers, including Filipinos living in the United States, are adversely affected. Whatever the real motivation PLDT and Globe have for seeking to

delay the Commission's consideration of the WorldCom and AT&T petitions, the fact remains that any extension of time will slow down the Commission's ability to address this urgent issue. Any such postponement does not serve the public interest. The Commission should not let PLDT and Globe benefit from their own disruptive actions by granting further delay.

Should PLDT and Globe agree to fully restore service with WorldCom, WorldCom would agree to the request for extension of time made by those carriers. However, absent any change in the service disruption on the U.S.-Philippines route, the Commission should not grant more than a one-day extension to Friday, February 21, 2003. Any more time would simply delay the Commission's ability to address the urgent service disruption on the US-Philippines route, to the great detriment of U.S. carriers and consumers.

Respectfully submitted,

WORLDCOM, INC.

By: _____

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February 19, 2003

CERTIFICATE OF SERVICE

I, Maria Ialacci, hereby certify that on this 19th day of February, 2003, a copy of the “WorldCom Opposition to Motions for Extension of Time” was delivered by first class mail to the persons listed below

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